

E-Filed on 10/14/09

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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA
12

13 In re

14 SPYROS D. KOUNTANIS,
15 Debtor(s).

Bankruptcy Case No. BK-S-09-22361-bam

Chapter 13

FIRST HORIZON HOME LOANS'S
REQUEST FOR SPECIAL NOTICE AND
SERVICE OF PAPERS AND
RESERVATION OF RIGHTS

17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR/DEBTORS AND ALL
18 INTERESTED PARTIES

19 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for FIRST
20 HORIZON HOME LOANS hereby requests special notice of all events relevant to the above-
21 referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-
22 referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy
23 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests
24 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
25 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other
26 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the
27 above-referenced bankruptcy court.
28

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
2 Mailing List in this case, the following address be used:

3 Eddie R. Jimenez
4 PITE DUNCAN, LLP
4375 Jutland Drive, Suite 200
5 P.O. Box 17933
San Diego, CA 92177-0933

6 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
7 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
8 waiver of the within party's:

9 a. Right to have any and all final orders in any and all non-core matters entered only
10 after de novo review by a United States District Court Judge;

11 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,
12 whether or not the same be designated legal or private rights, or in any case, controversy or
13 proceeding related hereto, notwithstanding the designation or not of such matters as "core
14 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant
15 to statute or the United States Constitution;

16 c. Right to have the reference of this matter withdrawn by the United States District
17 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

18 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
19 which this party is entitled under any agreements at law or in equity or under the United States
20 Constitution.

21 All of the above rights are expressly reserved and preserved by this party without
22 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing
23 or by any other participation in these matters.

24 Dated: October 14, 2009

25 /s/ Eddie R. Jimenez
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28 Attorney for FIRST HORIZON HOME LOANS